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Group

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

E.P., K.R., C.R., D.C., A.L., and B.G. individually and on behalf of all others similarly situated,

Plaintiffs,

v.

PROVIDENCE ST. JOSEPH HEALTH;
PROVIDENCE HEALTH & SERVICES;
PROVIDENCE HEALTH & SERVICES –
OREGON; PROVIDENCE WILLAMETTE
FALLS MEDICAL CENTER; PROVIDENCE
PORTLAND MEDICAL CENTER;
OREGON ANESTHESIOLOGY GROUP;
LEGACY HEALTH; and LEGACY MOUNT
HOOD MEDICAL CENTER,

Defendants.

Case No. 3:24-cv-01215-JR

DEFENDANT OREGON ANESTHESIOLOGY GROUP'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

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LR 7-1 CERTIFICATE OF CONFERRAL

Pursuant to LR 7-1(a), counsel for defendant Oregon Anesthesiology Group, P.C. certifies that its counsel conferred with counsel for plaintiffs E.P., K.R., C.R., D.C., A.L., and B.G. by electronic mail on August 20, 2024, before filing this motion, and they have no objection to this motion.

MOTION

Pursuant to Fed. R. Civ. P. 6 and LR 16-3, defendant Oregon Anesthesiology Group P.C. ("OAG"), moves for an extension of the August 28, 2024 deadline to respond to the First Amended Class Action Complaint ("FAC") filed by plaintiffs. In support of this motion, Defendant states as follows:

- 1. Plaintiff filed the FAC on July 31, 2024. (ECF No. 7.)
- 2. OAG was served on August 7, 2024.
- 3. OAG's response to the FAC is due August 28, 2024.
- 4. OAG seeks a 30-day extension of the August 28 deadline, up to and including September 27th, 2024.
- 5. There is good cause for the extension sought by OAG. The factual complexity and nature of the allegations and claims involve investigation before a responsive pleading can be filed. This motion is not for purpose of delay.

6. No party will be prejudiced by the granting of this motion, and Plaintiffs do not object to an extension of OAG's deadline to file a responsive pleading.

DATED: August 22, 2024

LANE POWELL PC

By: s/ Carter M. Mann

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